BellSouth Corporation
Suite 900
1133-21st Street, N.W.
Washington, DC 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463 4113
Fax 202 463 4198

November 14, 2003
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 01-321; WC Docket No. 02-112; and
CC Docket No. 00-175

Dear Ms. Dortch:

This is to inform you that on November 13, 2003, Dave Coon, Kevin Graulich, Al Varner and I, representing BellSouth, met with Julie Veach, Henr;y Thaggert, and Pam Megna of the Wireline Competition Bureau and Daniel Shiman of the Media Bureau. The purpose of the meeting was: to reiterate the reasons for BellSouth's belief that there is no need for a federally-mandated special access performance assurance plan; to respond to FCC staff questions about the metrics and standards that JCIG has proposed for such a plan; and to offer a plan that the Commission could use in lieu of the JCIG proposal if the Commission nonetheless decides to prescribe metrics and standards for interstate special access services. The attached documents formed the basis for the BellSouth presentation.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place it in the record of the proceedings identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachments

cc: Julie Veach
Henry Thaggert
Daniel Shiman
Pam Megna

Nov. 13, 2003. Meeting with FCC Staff

Special Access Measurem >>

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>> Agenda

1. **BellSouth does not believe that Special Access measurements are necessary or required.**
2. **BellSouth's response to Staff's questions of October 30, 2003.**
3. **If the Commission proceeds with the implementation of nationally mandated Special Access Performance Measurements, the Staff should streamline and clarify the measurement set into a more appropriate number of measurements and definitions**
4. **However, BellSouth has a better alternative that provides:**
   - Simplification of measurements
   - Clarification; less open to interpretation
   - Less burdensome
   - More meaningful and realistic performance standards
     - Analog standards instead of arbitrary benchmarks
   - Less duplicative metrics

>> Special Access Performance Measurements are Unnecessary

- The special access market is competitive
- Interstate special access tariffs provide performance guarantees
- RBOCs are committed to, and are improving, their very good service to their special access customers and must continue to do so to remain competitive
- Negotiation can accomplish legitimate policy goals of any performance assurance plan and is a better tool to address the diverse needs of the special access marketplace
- The performance measurements and standards proposed by JCIG are burdensome, unrealistic, unachievable, overly complex, subject to manipulation, and unjustified
- RBOCs currently report on key measures, both in aggregate and for specific customers, including certain JCIG members
- Self effectuating penalties, fines and forfeitures are unlawful
- Bottom line: Proceeding should be closed with no further action. The JCIG proposal should be rejected

Above comments are excerpts from 11/5/03 presentation to Chairman Powell

>> General Comments.

- **BellSouth agrees that the number of JCIG measurements that double count events should be removed.**
  - BellSouth believes that the multiple measurements being reviewed by the FCC staff can be handled by simply removing the extra measures in question.
- **JCIG incorrectly implies that ILECs currently do not have an incentive to complete work in a timely manner**
  - ILECs are motivated to provide excellent customer service
  - ILECs are already financially motivated to complete ordering (FOC) and provisioning (on time performance to FOC due date) functions in a timely manner
    - Any delay in completion of provisioning order equates to a delay in realizing Special Access revenues
    - BellSouth's Service Installation Guarantee (SIG) & Service Assurance Warranty (SAW) programs provide additional financial incentives for meeting customers expectations
- **The staff should limit disaggregation as this defeats the purpose of having a manageable measurement set.**
- **If a measurement plan is implemented, it should apply to all providers of Special Access Services.**

>> Response to Staff's questions: Issue 1

• Should JCIG measurement SA-1 be based on ASR receipt date, rather than FOC return date. This would capture FOCs not issued. To remove double counting, could measurement SA-2 be eliminated?

- **Using ASR receipt date would complicate SA-1.**
  - SA-1 is intended to measure percent of FOCs returned within a given interval. For each FOC there is a interval. Basing metric on ASRs received and relating it to the FOC interval would complicate this relationship.
  - Further complications would arise for ASRs received near the end of one reporting period and the FOC issued the beginning of the next period.
  - To address the possibility of a FOC not sent, a completeness calculation could be added to SA-1 as a diagnostic.
- **SA-2 should be eliminated regardless of changing the definition of SA-1**
  - SA-2 is the inverse of SA-1, which is confirmed by JCIG's target proposal of 2% FOC Receipt Past Due versus 98% FOC Receipt on Time (SA-1)

>> Response to Staff's questions: Issue 2

• Measurements SA-4 (On Time Performance), SA-5 (Days Late), SA-7 (Past Due Circuits) all measure ILEC's performance in meeting provisioning commitments. Can we have a single metric to eliminate double counting?

- **BellSouth response: Yes. We should have a single measurement based simply on meeting the scheduled due date.**
  - Addresses customer impacting event.
    - Other measurements are analytical tools. SA-5 and SA-7 give additional information on the same event.
  - Avoids issues with multiple intervals, depending on complexity.
  - Need only base measurement on the due date since it reflects the complexity and it the most important service delivery event..
  - Avoids duplicative measurements.
  - The ILEC has two revenue incentives to install the circuits on time.
    - Monthly recurring revenues
    - Service Installation Guarantees

>> Response to Staff's questions: Issue 3

•Should SA-9 (Failure Rate) be based on valid troubles found rather than trouble reports resolved?

• We have exclusions for CPE. How should we handle Test OK and No Trouble Found in the trouble report measurements?

- **BellSouth response: Exclude Test OK, but include No Trouble Found.**
  - Test OK indicates there was no trouble in the network and therefore it is not a valid trouble. It should not be included in a measurement which has a particularly stringent benchmark.
  - TOKs are driven primarily by the customer and inflate failure rate results
  - BellSouth's tariff requires customers to sectionalize troubles to BellSouth facilities
  - Inclusion of TOKs as proposed by JCIG is further exacerbated because they are reflected in overlapping measures SA-8 (Install. Trbl Report) and SA-11 (Repeat TRR)
  - No Trouble Found indicates that upon testing, a trouble was detected but when the technician was dispatched, the trouble could not be identified. Thus, it should be included in SA-9.

>> Response to Staff's questions: Issue 4

• SA-8 (New Installation Trouble Report Rate) – should we exclude repeats? Add new metric for Installation Repeats?

- **BellSouth response: Repeats should be excluded. This would more accurately measure initial installation quality.**
  - Purpose of Installation Trouble Report metric is a defect metric capturing the percent of our newly installed circuits that had troubles. Similar to manufacturing indices.
  - The metric should be stated as new installed circuits with troubles / newly installed circuits, not reports / newly installed circuits.
    - Automatically exclude repeats.
  - No need to establish a new measurement for installation repeats. It would provide no additional indication of whether the service was installed correctly.
    - Installation repeats are included in JCIG measurements SA-9 (Failure Rate) and SA-11 (Repeat Trouble Report Rate). BellSouth proposes to delete SA-11.
  - BellSouth would propose a 5 day period for New Installation Troubles. Troubles associated with the service order activity are more likely to happen within the first 5 days of the provisioning activity, therefore, troubles received after this point are commonly associated with normal maintenance activity.

>> Response to Staff's questions: Issue 5

•Measurements SA-8 (New Installation TRR), SA-9 (Failure Frequency), SA-11 (Repeat Rate) are duplicative in some aspects. What is our opinion?

- **BellSouth response: Troubles captured in SA-8 and SA-11 are also included in SA-9. BellSouth proposes to retain SA-8 and SA-9 and delete SA-11.**
  - SA-9 is the key network reliability metric
    - SA-9 captures all measured customer trouble reports
  - Delete SA-11.
    - SA-9 captures already captures all measured customer trouble reports
  - Although installation troubles are included in SA-9, there would appear to be a need to have a separate measurement of Installation Quality.
  - Retain SA-8 and minimize double counting by reducing timeframe.

>> Response to Staff's questions: Issue 5

•Measurements SA-8 (New Installation TRR), SA-9 (Failure Frequency), SA-11 (Repeat Rate) are duplicative to a degree.

- **Example of Newly Installed Circuit with 2 measured trouble reports within 5 days of install**

	1st Trouble	2nd Trouble
New Circuit TRR	**X**	**X**
Failure Frequency	**X**	**X**
Repeat Rate		**X**
Total Measured	**2**	**3**

- In this example <u>two</u> troubles were counted <u>five</u> times in the failure rate measurements.

>> Response to Staff's questions: Issue 6

•How do we define projects? How should we handle special orders such as projects?

- **BellSouth response:**
  - BellSouth defines a project based upon service type, complexity, and quantity of circuits ordered. Projects require a manual process to process the order, negotiate the due date, and check facility availability.
    - Qualifying services and quantities are listed in the Product and Services Guide.
    - Examples of BellSouth Project Definitions
      - DS0 Digital: 49 circuits and above
      - DS1: 25 circuits and above
  - Exclude from ordering measurements because project orders result in non-standard negotiated intervals.
  - ASR submittal dates are negotiated for projects to allow the customer to submit their ASRs on a reasonable schedule in accordance with their force and work load and to enable BellSouth to better meet their needs.
  - Projects are included in the provisioning and M&R measurements

>> Response to Staff's questions: Issue 7

•How should Customer Not Ready (CNR) be handled? Potentially open to abuse if CNR is excluded?

- **Exclude CNR from JCIG metrics. Further, would only have single measurement of provisioning timeliness per Issue 2.**
  - Abuse claim is exaggerated
    - Subject to audit
    - Self policing of dispatch
    - Damages customer relationship
  - But JCIG's SA-4, SA-5 and SA-7 require a "CNR" code for exclusion and requires the ILEC to notify the CLEC/IXC of CNR situation and 'allow period of time for CLEC/IXC to correct.'
    - JCIG's business rules (#5 as an example) that address CNR are vague and present administrative problems for the installer.
  - SA -6 (Average Installation Interval) ignores CNR.
  - BellSouth could provide CNR data if necessary.

>> Response to Staff's questions: Issue 8

•How should a 'no-facilities' situation be handled?

- **BellSouth response:**
  - No special treatment or additional disaggregation in the metrics is required.
    - The committed due date is established according to facility availability and is our provisioning objective.
    - FOC and Due Date objectives apply, regardless of facility availability.
  - Use single provisioning measurement based on meeting the committed due date in the FOC.
  - BellSouth recommends not reporting Average Days Late Due to a Lack of ILEC Facilities. Whether an order is missed due to lack facilities or a technician error has the same impact on the customer.

>> Response to Staff's questions: Issue 9

•Should the Special Access results be compared to a retail analog? CMRS?

- **BellSouth response: Should be based on an analog, but not simply a retail analog.**
  - There are analogous processes, therefore an analog is preferable to a benchmark. This has been repeatedly affirmed by FCC.
  - Proposed analogs
    - For Ordering, Provisioning, and M&R measurements, BellSouth and Bellsouth affiliates will be the analog
    - These are the same comparisons used for 272 reporting.
    - CMRS would not be an appropriate analog. Many installations of CMRS orders are in 'greenfield' locations.
  - JCIG benchmarks are arbitrary, unrealistic, burdensome.
    - Performance compared to benchmarks can also be influenced by serious weather events, which would be difficult to account for in a standardized performance measurement plan

>> Additional BellSouth concerns/issues with JCIG proposed measures

- **Several aspects of the JCIG measurements result in operational mandates or changes in process.**
  - SA-3 Offered Versus Requested Due Date refers to and utilizes JCIG determined standard intervals included Attachment B in JCIG's original proposal. Standard Intervals for DS0, DS1, &, DS3 classes of services are not measurement issues but they result in operational edicts.
  - The interval standards JCIG proposed should not be rigid but should be established based on the marketplace and customer demand, along with the economics of an ILEC to meet these intervals.
  - The business rules for CNR would require ILEC technicians to sit idly while waiting for the "reasonable period of time for the CLEC or IXC to correct the situation."
- **Additional Diagnostic measures**
  - The proposed JCIG measurement plan already has too many measurements, overlaying additional "diagnostic" measures, simply making the plan too complicated and often provides redundant or unnecessary information to the commission

>> Should FCC find a need for Special Access metrics, BellSouth has an alternative.

- Responds to Staff's questions
- Includes key measurements of Ordering, Provisioning and Maintenance and Repair.
- Captures the key performance areas of JCIG. These measurements reflect BellSouth's processes and procedures.
- Uses analogs instead of arbitrary benchmarks.
- Avoids multiple measurements of the same event.
- Eliminates duplication
- Removes ambiguity

>> BLS' alternative addresses many of Staff's issues.

Issue	BLS Alternate	JCIG
Issue 1: Captures FOCs not issued. Eliminates SA-2.	✓	×
Issue 2: Single metric for meeting provisioning commitments.	✓	×
Issue 3: Base Trouble Report Rate on valid troubles	✓	×
Issue 4: Exclude repeats from New Installation Trouble Report Rate.	✓	×
Issue 4 – cont'd: Provide new metric for Installation Repeat Troubles.	×	×
Issue 5: Resolve duplication of SA-8 (New Installation TRR), SA-9 (Failure Frequency), SA-11 (Repeat Rate)	✓	×
Issue 6: Recognizes that special orders such as projects requires varying time to process the order.	✓	×
-Includes special orders such as projects in prov. and M&R metrics.	✓	✓
Issue 7: Provides efficient and verifiable handling of CNR.	✓	×
Issue 8: Provides a reasonable solution to the 'no facilities' situation.	✓	×
Issue 9: Comparison of CLEC/IXC results versus an analog.	✓	×

BellSouth's Alternative Special Access metrics (Separate >> attachment)

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>> Response to Staff's questions: Issue 7

•How should Customer Not Ready (CNR) be handled?

- **Exclude CNR from JCIG metrics. Further, would only have single measurement of provisioning timeliness per Issue 2.**
  - JCIG's SA-4 (On Time Performance to FOC Due Date) calculates results with and without CNR consideration. SA-5, (Days Late) and SA-7, (Past Due) also addresses CNR.
  - But JCIG's SA-4, SA-5 and SA-7 require a "CNR" code for exclusion and requires the ILEC to notify the CLEC/IXC of CNR situation and 'allow period of time for CLEC/IXC to correct.'
    - JCIG's business rules (#5 as an example) that address CNR are vague and present administrative problems for the installer.
  - SA -6 (Average Installation Interval) ignores CNR.
  - BellSouth could provide CNR data if necessary.

BellSouth Service Quality Measurement Plan (SQM)

BellSouth Special Access Performance Metrics

Proposal

Version 1.00

Issue Date: September 4, 2003

Contents

Section 1: Ordering

SA-1: Firm Order Confirmation (FOC) Timeliness

Definition

Firm Order Confirmation (FOC) Timeliness measures the percentage of FOCs returned within the standard interval. The percentage of requests receiving a FOC is also calculated. A facility check is performed prior to the return of a FOC. A parity comparison is made between the service received by the Non- Affiliate Aggregate (IXC/CLEC) and the BellSouth Affiliates Aggregate.

Exclusions

- Service requests which are identified and classified as "Projects"
- Service requests which are canceled by the originator
- Weekends and designated holidays of the service center
- Unsolicited FOCs
- Administrative/or test service requests
- Disconnected Orders
- Rejected ASRs

Business Rules

Counts are based on each instance of a FOC sent from BellSouth. If one or more supplemental requests are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured. Days calculated are business days, Monday to Friday, excluding designated holidays. Activity starting on a weekend or holiday will reflect a start date of the next business day. Activity ending on a weekend or holiday will be calculated with an end date of the last previous business day. Requests received after 3 PM will be counted as a "zero" day interval if the FOC is sent by the close of business on the next business day.

Calculation

Firm Order Confirmation (FOC) Interval = (a - b)

- a = Date and Time FOC is Returned
- b = Date and Time Valid Service Request is Received

Percent within Standard Interval = (c / d) X 100

- c = Number of Service Requests Confirmed within the Designated Interval
- d = Total Number of Service Requests Confirmed in the Reporting Period

Percent FOC Completeness = (d / e) X 100 - Diagnostic

- d = Total Number of Service Requests Received and due during the Report Period that are Confirmed
- e = Total Number of Service Requests Received and due during the Report Period

Report Structure

- Non-Affiliates Aggregate
- BellSouth Affiliates Aggregate
- Geographic Scope
  - State

Data Retained

Relating to Non-Affiliate or BellSouth Affiliates Experience

- Report Month
- Total number of Service Requests
- Interval for FOC
- Total Number of FOCs

Relating to BellSouth Performance

- Report Month
- Total Number of Service Requests
- Interval for FOC
- Total Number of FOCs

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation (% within Standard Interval)	SQM Analog/Benchmark
• Special Access	Parity with BellSouth Affiliates
- DS0 % within 2 business days	Parity with BellSouth Affiliates
- DS1 % within 2 business days	Parity with BellSouth Affiliates
- DS3 (Non Optical) % within 5 business days	Parity with BellSouth Affiliates
- DS3 (Optical OCn) Individual Case Basis (ICB)	Diagnostic

Section 2: Provisioning

SA-2: Percent Installation Appointments Met

Definition

Percent Installation Appointments Met measures the percentage of installation commitments completed on/before the FOC Due Date, as recorded from the FOC sent in response to the last ASR received. An analog comparison is made between the service received by the Non-Affiliate Aggregate (IXC/CLEC) and the BellSouth Affiliates Aggregate.

Exclusions

- Orders issued and subsequently canceled
- Orders associated with internal or administrative activities
- Misses for customer reasons
- Disconnect Orders
- All Appointment Codes except "L", "W", and "X"
- Unsolicited FOCs

Business Rules

This measurement is calculated by dividing the number of circuits completed during the reporting period, on or before the Bellsouth provided commitment date, by the total number of circuits committed to completion during the same reporting period.

Calculation

Percent Installation Appointments Met = (a / b) X 100

- a = Number of circuits completed on or before the BellSouth committed due date during the reporting period
- b = Total number of circuits committed to completion during the reporting period

Report Structure

% Installation Appointments Met

- Non-Affiliates Aggregate
- BellSouth Affiliates Aggregate
- Geographic Scope
  - State

Data Retained

Relating to Non-Affiliates or BellSouth Affiliates Experience

- Report Month
- Service Order Information
- Number of Circuits

Relating to BellSouth Performance

- Report Month
- Service Order Information
- Number of Circuits

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Special Access	Parity with BellSouth Affiliate
- DS0	Parity with BellSouth Affiliate
- DS1	Parity with BellSouth Affiliate
- DS3 (Non Optical)	Parity with BellSouth Affiliate
- DS3 (Optical OCn)	Parity with BellSouth Affiliate

SA-3: New Installation Trouble Report Rate

Definition

New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 5 calendar days of the installation. An analog comparison is made between the Non-Affiliate Aggregate (IXC/CLEC) and the BellSouth Affiliates Aggregate.

Exclusions

- Trouble tickets canceled at the IXC/CLEC or BellSouth Affiliate request
- Customer Provided Equipment (CPE) or other customer caused troubles
- BellSouth troubles associated with administrative service
- Tickets used to track referrals of misdirected calls
- IXC/CLEC or BellSouth Affiliate requests for informational tickets
- Invalid trouble reports
- TOK
- Installation Repeat Reports

Business Rules

1. The first trouble report from a service order after completion is counted in this measure. Repeat trouble reports are measured in the Failure Rate/Trouble Report Rate. Reports are calculated searching in the prior report period for completed service orders and the following 5 days after completion of the service order for a trouble report issue date.

2. BellSouth Completion Date is the date upon which BellSouth completes installation of the circuit, as noted on a completion advice to the IXC/CLEC or BellSouth Affiliate.

3. The calculation for the following 5 calendar days is based on the creation date of the trouble ticket.

Calculation

Trouble Report Rate within 5 Calendar Days within Installation = (a / b) X 100

- a = The Counts of Circuits with Trouble Reports within 5 Calendar Days of Installation
- b = The Total Number of Circuits Installed in the Report Period

Report Structure

- Non-Affiliates Aggregate
- BellSouth Affiliates Aggregate
- Geographic Scope
  - State

Data Retained

Relating to Non-Affiliates or BellSouth Affiliates Experience

- Report Month
- Trouble Report Count within Calendar 5 Days of Installation
- Total Count of Circuits Installed in Report Period

Relating to BellSouth Performance

- Report Month
- Trouble Report Count within Calendar 5 Days of Installation
- Total Count of Circuits Installed in Report Period

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Special Access	Parity with BellSouth Affiliate
- DS0	Parity with BellSouth Affiliate
- DS1	Parity with BellSouth Affiliate
- DS3 (Non Optical)	Parity with BellSouth Affiliate
- DS3 (Optical OCn)	Parity with BellSouth Affiliate

SA-4: Failure Rate/Trouble Report Rate

Definition

The percentage of initial and repeated circuit specific Non-Affiliates (IXC/CLEC) or BellSouth Affiliates trouble reports completed per 100 in-service circuits for the reporting period. An analog comparison is made between the Non-Affiliate Aggregate (IXC/CLEC) and the BellSouth Affiliates Aggregate.

Exclusions

- Trouble reports issued and subsequently canceled
- Employee initiated trouble reports
- Trouble reports associated with internal or administrative activities
- Customer Provided Equipment (CPE) or other customer caused troubles
- Reciprocal Services
- Tie Circuits
- Informational Tickets
- Missed Directed Call Ticket
- TOK

Business Rules

The trouble report rate is computed by dividing the number of completed trouble reports handled during the reporting period by the total number of in service circuits for the same period. The resulting answer is multiplied by 100 and expressed as the number of completed trouble reports per 100 in service circuits.

Calculation

Percent Trouble Report Rate = (a / b) X 100

- a = Number of Completed Circuit Specific Trouble Reports closed during the Reporting Period
- b = Total Number of in Service Circuits during the Period

Report Structure

- Non-Affiliates Aggregate
- BellSouth Affiliates Aggregate
- Geographic Scope
  - State

Data Retained

Relating to Non-Affiliates or BellSouth Affiliates Experience

- Report Month
- Trouble Reports
- Number of Trouble Reports by Product Category
- Total Number of in Service Circuits during the Reporting Period

Relating to BellSouth Performance

- Report Month
- Trouble Reports
- Number of Trouble Reports by Product Category
- Total Number of in Service Circuits during the Reporting Period

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Special Access	Parity with BellSouth Affiliate
- DS0	Parity with BellSouth Affiliate
- DS1	Parity with BellSouth Affiliate
- DS3 (Non Optical)	Parity with BellSouth Affiliate
- DS3 (Optical OCn)	Parity with BellSouth Affiliate

SA-5: Average Repair Interval

Definition

The average outage duration is expressed in hours for completed circuit specific trouble reports. An analog comparison is made between the Non-Affiliate Aggregate (IXC/CLEC) and the BellSouth Affiliates Aggregate.

Exclusions

- Trouble reports issued and subsequently canceled
- Employee initiated trouble reports
- Trouble reports associated with internal or administrative activities
- Customer Provided Equipment (CPE) or other customer caused troubles
- Reciprocal Trunks
- Tie Circuits
- Informational Tickets
- Circuit Monitoring Trouble Tickets
- Misdirected Call Tickets

Business Rules

The average outage duration is calculated for each closed circuit specific trouble report. The start time begins with the receipt of the trouble report and ends with the clearance of the trouble report. Customer hold time or delay maintenance time resulting from verifiable situation of no access to the end user premise, other CLEC/IXC or BellSouth Affiliate caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval.

Calculation

Repair Interval = (a – b)

- a = Date and Time of Trouble Report Closeout
- b = Date and Time Trouble Report was Received

Average Repair Interval = (c / d)

- c = Total of all Repair Intervals (in hours) for the Reporting Period
- d = Total Number of Trouble Reports Closed during the Reporting Period

Report Structure

Average Repair Interval

- Non-Affiliates Aggregate
- BellSouth Affiliates Aggregate
- Geographic Scope
  - State

Data Retained

Relating to Non-Affiliates or BellSouth Affiliates Experience

- Report Month
- Trouble Reports
- Number of Trouble Reports by Product Category

Relating to Bellsouth Performance

- Report Month
- Trouble Reports
- Number of Trouble Reports by Product Category

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Special Access	Parity with BellSouth Affiliate
- DS0	Parity with BellSouth Affiliate
- DS1	Parity with BellSouth Affiliate
- DS3 (Non Optical)	Parity with BellSouth Affiliate
- DS3 (Optical OCn)	Parity with BellSouth Affiliate

GLOSSARY

Access Service Request (ASR)	A request to BellSouth to order new access service, or request a change to existing service, which provides access to the local exchange company's network under terms specified in the local exchange companies special or switched access tariffs
Appointment Codes	W: Company offered due date or the appointment requested by the customer is the same as the offered date. L: Customer requested a later due date than the offered date. X: The customer has requested an earlier date than the offered date and the company granted the request. This code will be used rarely since expedited requests must be approved
BellSouth Affiliates	Entities associated with BellSouth such as BSLD, BSE, Cingular, BellSouth End Users
BSE	BellSouth Enterprises – a BellSouth CLEC
Business Days	Monday thru Friday excluding holidays
BSLD	BellSouth Long Distance
"C Order"	Order issued to make changes to an existing account
CDDD	Customer Desired Due Date
CPE	Customer Provided Equipment
Customer Not Ready (CNR)	A verifiable situation beyond the normal control of BellSouth that prevents Bellsouth from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company or CPE (Customer Provided Equipment) supplier, is not ready.
(SA)	No access to subscriber premises
(SR)	Customer Not Ready
(SL)	Customer Requests Later Date
(SO)	Customer Other
(SP)	Subscriber Prior: The customer requests an earlier due date than the original request.
Facility Check	A pre-provisioning check performed by BellSouth, in response to an access service request, to determine the availability of facilities and assign the installation date.
Firm Order Confirmation (FOC)	The notice returned from BellSouth, in response to an Access Service Request from a CLEC or IXC Carrier that confirms receipt of the request, that a facility has been made, and that a service request has been created with an assigned due date.
NTF	No trouble found
Unsolicited FOC	An Unsolicited FOC is a supplemental FOC issued by Bellsouth to change the due date or for other reasons, although no change to the ASR was requested by the CLEC or IXC Carrier
PIC	Preferred Interstate Carrier
Project	Service requests that exceed the line size and/or level of complexity that would allow the use of standard ordering and provisioning processes
Query/Reject	BellSouth responses to an ASR requesting clarification or correction to one or more fields on the ASR before an FOC can be issued
Reciprocal Services	Services that BellSouth provides IXCs/CLECs as a transmission path back to our network
Repeat Trouble	Trouble that reoccurs on the same telephone number/circuit ID within 30 calendar days
Supplement ASR	A revised ASR that is sent to change due dates or after the original ASR request. A "Version" indicator related to the original ASR number tracks each Supplement ASR
TOK	Test OK

Symbols used in Calculations

-
A mathematical operator representing subtraction.

+
A mathematical operator representing addition.

/
A mathematical operator representing division.

<
A mathematical symbol that indicates the metric on the left of the symbol is less than the metric on the right.

<=
A mathematical symbol that indicates the metric on the left of the symbol is less than or equal to the metric on the right.

>
A mathematical symbol that indicates the metric on the left of the symbol is greater than the metric on the right.

>=
A mathematical symbol that indicates the metric on the left of the symbol is greater than or equal to the metric on the right.

( )
Parentheses, used to group mathematical operations which are completed before operations outside the parentheses.